

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK _____

VIRAL BHAGAT

Docket No. 1:24-cv-01424-VEC

Plaintiff,

— against —

ANUJA SHARAD SHAH a/k/a ANU SHAH

Defendant.

DECLARATION OF COUNSEL

Lawrence Katz, Esq. declares, subject to the penalties of perjury, that the following is true and correct to his knowledge:

1. I am an attorney duly admitted to practice in the U.S. District Court for the Southern District of New York.

2. I am a senior associate of The Alber firm, which represents Plaintiff, Viral Bhagat (“Plaintiff”) in the above captioned action.

3. Both Michael J. Alber, a partner in the firm, and myself have appeared in this action on behalf of the defendant.

4. I am fully familiar with the facts and circumstances of this action.

5. I submit this Declaration in support of the Motion to Withdraw as Counsel of Record for Plaintiff, pursuant to Rule 1.4 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York.

6. We are requesting the following relief:

(1) Leave to withdraw as counsel for Defendant due to the severing of the attorney-client relationship by the client terminating our services and requesting we make this motion; and

(2) A stay of proceedings to allow Defendant sufficient time to respond to various discovery motions and demands.

7. The Defendant has been notified of the undersigned's intention to file the instant application.

8. Defendant will be representing herself in this matter.

9. Defendant has made this decision in large part due to the numerous applications made by plaintiff, pro se, which have increased the cost of counsel fees in this matter and made continuing with counsel financially untenable.

10. Withdrawal is appropriate at this time because the client has affirmatively discharged counsel. and the attorney-client relationship must therefore end.

Wherefore the attorneys for defendant request that Michael J. Alber, Lawrence Katz and The Alber Firm be relieved as counsel for defendant and the proceedings be temporarily stayed.